

EXHIBIT “F”

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

AMERICAN ENVIRONMENTAL
ENTERPRISES, INC., d/b/a THE
SAFETYHOUSE.COM,

Plaintiff,

v.

MANFRED STERNBERG, ESQUIRE, and
MANFRED STERNBERG & ASSOCIATES, PC,
and CHARLTON HOLDINGS GROUP, LLC, and
SHLOMO GROSS a/k/a SAMUEL GROSS, and
GARY WEISS, and A.SOLAR, LLC, and
DAPHNA ZEKARIA, ESQUIRE, and
SOKOLSKI & ZEKARIA, P.C.

Defendants

CIVIL ACTION

No. 2:22-CV-0688 (JMY)

**REVISED RESPONSES AND OBJECTIONS OF DEFENDANTS, DAPHNA ZEKARIA,
ESQUIRE, AND SOKOLSKI & ZEKARIA, P.C., TO PLAINTIFF'S FIRST REQUEST FOR
PRODCUTION OF DOCUMENTS**

Defendants, Daphna Zekaria, Esquire and Sokolski & Zekaria, P.C., by and through their attorneys, Rebar Kelly, hereby file the within Revised Responses and Objections to Plaintiff's Request for Production of Documents and state as follows:

1. All documents evidencing any wires or other receipts of funds from any of the Sternberg Defendants, or the Gross Defendants, or the Weiss Defendants, or anyone else, pertaining to the purchase of iCovid test kits (whether for Plaintiff or another purchaser).

RESPONSE: Please see documents previously produced and Bates stamped ZEKARIA000017 through ZEKARIA000035.

2. All documents evidencing any wires or other transfers of funds you made to any of the Sternberg Defendants, or the Gross Defendants, or the Weiss Defendants, or anyone else, pertaining to the purchase of iCovid test kits (whether for plaintiff or another purchaser).

RESPONSE: Please see documents previously produced and Bates stamped ZEKARIA000017 through ZEKARIA000035.

3. All documents requested or identified in the Interrogatories propounded upon you.

RESPONSE: Please see documents previously produced and Bates stamped ZEKARIA000001 through ZEKARIA000035.

4. Your full and complete electronic files and paper file documents for or concerning the Weiss Defendants.

RESPONSE: Any discoverable documents in the possession of Answering Defendants related to the instant matter have been produced and Bates stamped ZEKARIA000001 through ZEKARIA000035.

5. Your full and complete electronic files and paper file documents for or concerning the Gross Defendants.

RESPONSE: Objection. This request is overbroad, unduly burdensome, and beyond the scope of permissible discovery, and concerns matters of attorney client privilege. Without waiving said objection, any discoverable documents in the possession of Answering Defendants related to the instant matter have been produced and Bates stamped ZEKARIA000001 through ZEKARIA000035.

6. Your full and complete electronic files and paper file documents for or concerning or pertaining to the Sternberg Defendants.

RESPONSE: All documents responsive to this interrogatory have been produced and Bates stamped ZEKARIA000001 through ZEKARIA000035.

7. Any documents for or concerning or pertaining to TSH Invoice No. 18315 attached as the first page of Exhibit “1” to the Complaint.

RESPONSE: None in possession of Answering Defendants.

8. Any documents for or concerning or pertaining to the Sale Agreement.

RESPONSE: None in possession of Answering Defendants.

9. Any documents for or concerning or pertaining to the Order.

RESPONSE: None in possession of Answering Defendants.

10. Any documents for or concerning or pertaining to plaintiff’s purchase of or the provision of any Test Kits to plaintiff.

RESPONSE: None in possession of Answering Defendants.

11. Any documents for or concerning or pertaining to the purchase or acquisition of any Test Kits by any Defendant.

RESPONSE: None in possession of Answering Defendants.

12. All Documents and Communications pertaining to your receipt of any money from any Defendant during the time period of December 1, 2021, through June 30, 2022, for the purchase of Test Kits or otherwise, including without limitation: (a) each of the monthly bank statements for each applicable bank account; and (b) all Documents showing each deposit made into such bank account; and (c) all Documents showing each wire-transfer or other withdrawal from such bank account for the purchase of Test Kits or otherwise; and all Documents identifying to whom each such outgoing wire-transfer or withdrawal was sent, and why.

RESPONSE: See documents previously produced and Bates stamped ZEKARIA000017 through ZEKARIA000035.

13. All Documents and Communications you had with any manufacturer or vendor or shipper or any other person or entity in connection with any of the 151,200 Test Kits which are the subject of the instant lawsuit.

RESPONSE: None in possession of Answering Defendant.

14. Any and all Documents which reflect, refer or relate to the shipping of any Covid test kits purchased by plaintiff from December 1, 2022 through June 30, 2022, including, but not limited to, any warehouse or storage facility, and bills of lading, and Contact Information for any such warehouse or storage facility.

RESPONSE: None in possession of Answering Defendants.

15. Any and all Documents which reflect, refer or relate to the sale of any Covid test kits by any Defendant to any person or entity during the time period of December 1, 2021 through June 30, 2022, including but not limited to, purchase orders, sale agreements and bills of lading.

RESPONSE: None in possession of Answering Defendant.

16. All documents evidencing any Communications including, but not limited to, emails and text messages, between any you and any Sternberg Defendant, which in any way reflect, refer or relate to the purchase or sale of any Test Kit, between December 1, 2021 and June 30, 2022.

RESPONSE: None in possession of Answering Defendants.

17. All documents evidencing any Communications including, but not limited to, emails and text messages, between any you and any Weiss Defendant, which in any way reflect,

refer or relate to the purchase or sale of any Test Kit, between December 1, 2021 and June 30, 2022.

RESPONSE: See documents previously produced and Bates stamped ZEKARIA000001 through ZEKARIA000012.

18. All documents evidencing any Communications including, but not limited to, emails and text messages, between any you and any Gross Defendant, which in any way reflect, refer or relate to the purchase or sale of any Test Kit, between December 1, 2021 and June 30, 2022.

RESPONSE: See documents previously produced and Bates stamped ZEKARIA000001 through ZEKARIA000012.

19. All documents and Communications including, but not limited to, emails and text messages, between you and any Weiss Defendant and/or any common carrier which in any way reflect, refer or relate to the issuance of any and all bills of lading for any Test Kits between December 1, 2021 and June 30, 2022.

RESPONSE: None in possession of Answering Defendants.

20. All Communications including, but not limited to, emails and text messages, between ASOALR and any common carrier which in any way reflect, refer or relate to the issuance of any and all bills of lading for any Test Kits purchased by plaintiff, between December 1, 2021, and June 30, 2022.

RESPONSE: None in possession of Answering Defendants.

21. A true and correct complete copy of each and every actual bill of lading issued for any Test Kits purchased by plaintiff, between December 1, 2021, and June 30, 2022, and all Documents showing when each bill of lading was issued and from whom.

RESPONSE: None in possession of Answering Defendants.

22. Any and all bills of sale issued by or to any Weiss Defendant or any Gross Defendant for Test Kits between December 1, 2021, and June 30, 2022, including all Documents showing when each bill of sale was issued, by whom, and the manner in which each such bill of sale was sent to the Defendant.

RESPONSE: None in possession of Answering Defendants.

23. All Communications including, but not limited to, emails and text messages, which in any way reflect, refer or relate to Sternberg's February 8, 2022 email (attached as Exhibit "3" to the Complaint) that the Test Kits were "in route for delivery as previously directed," including without limitation: the identity of the manufacturer or supplier of those Test Kits; and the number of Test Kits that were "in route for delivery;" and who supplied that information to Sternberg; and the Bill of Lading issued for that shipment.

RESPONSE: None in possession of Answering Defendants.

24. All Communications including, but not limited to, emails and text messages, between you and/or any Defendant and the individual known as "Shraga" which in any way reflect, refer or relate to the delivery of any Test Kits to TSH.

RESPONSE: None in possession of Answering Defendants.

25. All Documents which in any way set forth, refer or relate to the Contact Information for "Shraga."

RESPONSE: None in possession of Answering Defendants.

26. All documents and Communications including, but not limited to, emails and text messages, between you and/or any of the Defendants which in any way reflect, refer, or relate to the delivery of any Test Kits to Plaintiff on or about February 17, 2022.

RESPONSE: None in possession of Answering Defendants.

27. All documents and Communications including, but not limited to, emails and text messages, between any of the Third-Party Defendants and any of the Defendants which in any way reflect, refer, or relate to the delivery of the Test Kits to Plaintiff at any time.

RESPONSE: None in possession of Answering Defendant,

28. Any and all documents and Communications including, but not limited to, letters, emails and texts, which reflect, refer or relate to any request made by any Defendant for diamonds and/or gemstones or any other collateral from any Weiss Defendant.

RESPONSE: None in possession of Answering Defendants.

29. Any and all documents and Communications including, but not limited to, letters, emails and texts, which reflect, refer or relate to any your receipt of any diamonds and/or gemstones or any other collateral from any Weiss Defendant.

RESPONSE: See documents previously produced and Bates stamped ZEKARIA000013 through ZEKARIA000016.

30. Any and all documents and Communications including, but not limited to, letters, emails and texts, which reflect, refer or relate to any your subsequent disposition of any diamonds and/or gemstones or any other collateral from any Weiss Defendant.

RESPONSE: See documents previously produced and Bates stamped ZEKARIA000013 through ZEKARIA000016.

31. Third-Party Defendant for payments made by any Defendant or attorney Daphna Zekaria to any Third-Party Defendant for Test Kits.

RESPONSE: None in possession of Answering Defendants.

32. Any and all Documents and Communications including, but not limited to, letters, emails and texts, which reflect, refer or relate to any collateral provided by any Third-Party Defendant, or entity related to any Third-Party Defendant, for payments made by any Defendant or attorney Daphna Zekaria to any Third-Party Defendant for Test Kits.

RESPONSE: None in possession of Answering Defendants,

33. Any and all Documents and Communications including, but not limited to, letters, emails and texts, which reflect, refer or relate to the type and/or nature of any collateral provided by any Third-Party Defendant, or entity related to any Third-Party Defendant, for payments made by any Defendant or attorney Daphna Zekaria to any Third-Party Defendant for Test Kits.

RESPONSE: None in possession of Answering Defendants.

34. Any and all Documents and Communications including, but not limited to, letters, emails and texts, which reflect, refer or relate to any receipts provided by any Defendant for any collateral obtained from any Third-Party Defendant, or entity related to any Third-Party Defendant, for payments made by any Defendant or attorney Daphna Zekaria to any Third-Party Defendant for Test Kits.

RESPONSE: None in possession of Answering Defendants.

35. All Documents which in any way reflect, refer or relate to the expiration dates of the Test Kits shipped or proposed to be shipped to Plaintiff.

RESPONSE: None in possession of Answering Defendants.

36. Any and all Documents which in any way reflect, refer or relate to the names, addresses and current location of any person that has knowledge of any claim asserted by any party in this action.

RESPONSE: Other than the documents already produced, none in possession of Answering Defendants.

37. Complete copies of all expert reports and drafts of expert reports.

RESPONSE: Answering Defendants have not yet determined which, if any, expert witness(es) they will call at the time of trial of this matter. Discovery is ongoing and Answering Defendants reserve the right to supplement this response at a later date and in accordance with the applicable Rules of Civil Procedure and Orders issued by this Court.

38. Any and all statements or drafts of statements obtained from any person that is in any way related to any claim or defense asserted by any party in this action.

RESPONSE: None in possession of Answering Defendants.

39. Any and all Documents which any Third-Party Defendant provided to any expert witness or potential expert witness in this action.

RESPONSE: Answering Defendants have not yet determined which, if any, expert witness(es) they will call at the time of trial of this matter. Discovery is ongoing and Answering Defendants reserve the right to supplement this response at a later date and in accordance with the applicable Rules of Civil Procedure and Orders issued by this Court.

40. Any and all Documents used or to be used by any expert in this action.

RESPONSE: Answering Defendants have not yet determined which, if any, expert witness(es) they will call at the time of trial of this matter. Discovery is ongoing and Answering Defendants reserve the right to supplement this response at a later date and in accordance with the applicable Rules of Civil Procedure and Orders issued by this Court.

41. The curriculum vitae or resume of all expert witnesses.

RESPONSE: Answering Defendants have not yet determined which, if any, expert witness(es) they will call at the time of trial of this matter. Discovery is ongoing and Answering Defendants reserve the right to supplement this response at a later date and in accordance with the applicable Rules of Civil Procedure and Orders issued by this Court.

42. All Documents which refer, reflect or relate to any claim of damages you allegedly suffered.

RESPONSE: Answering Defendants have yet to make this determination. Discovery is ongoing and Answering Defendants reserve the right to supplement this response at a later date and in accordance with the applicable Rules of Civil Procedure and Orders issued by this Court.

43. All Documents which support the allegations in any Answer filed, or to be filed, by any Third-Party Defendant to Defendants' Third-Party Complaint.

RESPONSE: None in possession of Answering Defendants, as Answering Defendants have made no "allegations" in any pleading they have filed.

44. All Documents which support the allegations of any Affirmative Defense filed, or to be filed, by any Third-Party Defendant to Defendants' Third-Party Complaint.

RESPONSE: Answering Defendants have not yet made this determination. Discovery is ongoing and Answering Defendants reserve the right to supplement this response at a later date and in accordance with the applicable Rules of Civil Procedure and Orders issued by this Court.

45. All Documents which support the allegations of any Counterclaim filed, or to be filed, by any Third-Party Defendant to Defendants' Third-Party Complaint.

RESPONSE: None in possession of Answering Defendants, as no counterclaim was filed.

46. All Documents upon which any Third-Party Defendant will rely or will introduce as evidence or as an exhibit at trial.

RESPONSE: Answering Defendants have not yet made this determination. Discovery is ongoing and Answering Defendants reserve the right to supplement this response at a later date and in accordance with the applicable Rules of Civil Procedure and Orders issued by this Court. Answering Defendants reserve the right to introduce at the time of trial any and all documents exchanged by the parties in discovery by any manner.

47. All Documents upon which any Third-Party Defendant will rely or will introduce as evidence or as an exhibit at trial, in support of each of Defendant's Affirmative Defenses.

RESPONSE: Answering Defendants have not yet made this determination. Discovery is ongoing and Answering Defendants reserve the right to supplement this response at a later date and in accordance with the applicable Rules of Civil Procedure and Orders issued by this Court.

48. All Documents which reflect, refer or relate to any Communications by or between you and any of the Defendants regarding Plaintiff.

RESPONSE: None in possession of Answering Defendants.

49. All Documents which reflect, refer or relate to any Communication between you and any other person or entity concerning Plaintiff.

RESPONSE: None in possession of Answering Defendant.

50. Any and all Documents provided by you to any other party in this action.

RESPONSE: See documents previously produced and Bates stamped ZEKARIA000001 through ZEKARIA000035..

51. Any and all Documents provided to you by any other party in this action.

RESPONSE: None in possession of Answering Defendant.

52. Full and complete copies of each and every Third-Party Defendant insurance policy (including all declaration pages and amendments thereto) which covers or may cover any claims that Defendants have asserted against the Third-Party Defendants in this action or which Plaintiff has asserted against the Defendants.

RESPONSE: Answering Defendants do not have insurance coverage for this matter.

53. For the time period of February 24, 2012 through the present, all Documents in the possession or control of any Third-Party Defendant pertaining to any fraud or breach of contract claims made by any other person or entity or their attorney, against any of the Third-Party Defendants, and Documents pertaining to any Communications and/or settlement negotiations involving any such person or entity, including without limitation: VRC Medical Supplies; and Hand Safety, LLC; and David Wright and/or DKW Consulting LLC.

RESPONSE: None in possession of Answering Defendant.

54. For the time period of February 24, 2012 through the present, all Documents in the possession or control of any Third-Party Defendant identifying or pertaining to any criminal charges asserted against Weiss, including Documents pertaining to any charges of or conviction for embezzlement or larceny or any other crime, and/or probation in connection therewith.

RESPONSE: None in possession of Answering Defendants.

55. For the time period of February 24, 2012 through the present, all Documents in the possession or control of any Third-Party identifying or pertaining to any criminal charges asserted

against ASOLAR, including documents pertaining to any charges of or conviction for embezzlement or larceny or any other crime, and/or probation in connection therewith.

RESPONSE: None in possession of Answering Defendants.

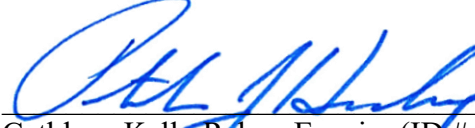
56. Regardless of time period, all Documents in the possession or control of any Third-Party Defendant identifying or pertaining to any disciplinary inquiry, complaint or proceeding brought against any Sternberg Defendant in any jurisdiction which in any way relates to any license to practice law of any Sternberg Defendant.

RESPONSE: None in possession of Answering Defendants.

57. All Documents requested in or responsive to, any of the Interrogatories dated of even date herewith and accompanying these Document Requests.

RESPONSE: See documents previously produced and Bates stamped ZEKARIA000001 through ZEKARIA000035.

REBAR KELLY



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DATE: April 15, 2024